

Dear GentleFolk,

I am concerned with the proposed rule change (ref:FAA-1998-4521) regarding Air Tour Operators and charity flight operators.

Others have questioned the need for the proposed rule change in its entirety. I can understand the need for some regulatory changes to bring some larger commercial operators that are using the letter of the regulation to avoid the spirit of the regulation into alignment with Part 135. I wish to propose the following amendment to the proposed rule change:

Recommendation A-95-58 to remove the 119.1(e)(2) exemption is extreme. At present, the exemption allows up to 30 passengers and aircraft with a payload of 7,500 pounds... which seems to this commentor to be a 'commercial' craft which should be under Part 135. I propose instead of eliminating the exemption, it may be changed to read "six (6) or fewer" passengers and "payload of 1,500 pounds". This will have the desired effect of bringing large craft operators under Part 135 rules, while leaving the small classic aircraft and local light plane airtour operators with the exemption that is in the best interests of the GA community... the reason the exemption existed in the first place.

Secondly, adding the requirement that charity flight pilots conform to the Part 135 rules for 500 logged flight hours seems unjustified as the rules already require notice and oversight by the FAA, VFR, etc. Safety is already built into the regulations.

Thank you for the opportunity to comment,

Sincerely,

Candice H. Brown-Elliott